UNITED STATES BANKRUPTCTY COURT DISTRICT OF MASSACHUSETTS

IN RE:)
)
Juliann F. Hoch,) Chapter 13
) Case No.: 17-14031-JNF
Debtor)
)

<u>DEBTOR'S RESPONSE TO MOTION OF CHAPTER 13 TRUSTEE FOR ORDER</u> <u>DISMISSING CASE</u>

Now comes the Debtor, Juliann F. Hoch, by and through her Counsel, and respectfully responds to the Motion of Chapter 13 Trustee for Order Dismissing Case as follows:

- 1. Debtor, Juliann F. Hoch, commenced this case on October 30, 2017 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code;
- 2. On April 9, 2018, A Motion of Chapter 13 Trustee for Order Dismissing Case was filed, stating the Chapter 13 Plan failed to fully account for the proof of claims filed and the Massachusetts Department of Revenue ("MDOR") has filed a Notice of Unfiled Prepetition State Tax Returns;
- 3. On May 8, 2018, Debtor filed the First Amended Plan to adequately provide for the proof of claims filed; and
- 4. On May 9, 2018, Debtor filed an Affidavit stipulating that she was not required to file tax returns with the MDOR for the years specified since she was living in Connecticut during that time frame.

For the foregoing reasons, the Debtor prays for the Motion of Chapter 13 Trustee for Order Dismissing Case to be withdrawn in the present case and any and all other relief that this Court may deem just and proper.

Respectfully Submitted, Juliann F. Hoch,

By his attorney,

Matthew C. Swanson, Esq. (BBO#661840)

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